

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:
Francisco Rosa	:
Teresa Cruz	: Chapter 13
	:
	:
Debtors	: Bankruptcy No. 19-17098-jkf
	:

NOTICE OF MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, by their attorney, Erik B. Jensen, has filed a Motion to Avoid Lien.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult an attorney.

1. If you do not want the Court to grant the Motion, or if you want the court to consider your views on the motion, then on or before March 4, 2020 you or your attorney must do all of the following:

(a) file an answer explaining your position at
Office of the Clerk
United States Bankruptcy Court
Suite 400
900 Market Street
Philadelphia PA 19107

If you mail your answer to the Bankruptcy Clerks Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's Attorney:
Erik B. Jensen, Esquire
Jensen Bagnato, P.C.
1500 Walnut Street, Suite 1920
Philadelphia, PA 19102

Scott Waterman, Trustee
2901 St. Lawrence Avenue
Suite 100
Reading PA 19606

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1 (b) above and attend the hearing, the court may enter an Order granting the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Jean K. FitzSimon, United States Bankruptcy Judge on March 11, 2020 at 9:30AM, Courtroom 3, United States Bankruptcy Court, 900 Market Street, 2nd Floor.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800, to find out whether the hearing has been cancelled because no one filed an answer.